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SAAD SITE STEERING COMMITTEE
May 2, 1994

16909
EXHIBIT

593

Ms. Wilda Cobb
U.S. EPA - Region IV
345 Courtland St., N.E.
Atlanta, GA 30365

Re: John P. Saad & Sons Superfund Site, Nashville, Tennessee

Dear Wilda:

In light of U.S. EPA's position that the Steering Committee's recommendations are not acceptable, the Steering Committee has elected to offer to conduct removal work at this time. A description of the removal work that the Steering Committee proposes to conduct is attached to this letter. If this work is acceptable to U.S. EPA, then a work plan will be prepared for approval and the most recent Administrative Order on Consent will need to be amended to add this work. It is important to the Steering Committee that the description of this work, both in the work plan and in the AOC, be discreet and that this work conclude U.S. EPA's removal action so that the Steering Committee may proceed to address the Site with the Tennessee Division of Superfund under its remedial program.

The Steering Committee has maintained, and continues to maintain, that additional removal action is inappropriate and unnecessary, and that instead the appropriate next action should be a remedial investigation/feasibility study conducted under the supervision of the Tennessee Division of Superfund as part of a remedial process. This position of the Steering Committee, and the reasons for it, are detailed in the Steering Committee's letter to Ms. Elizabeth B. Davis dated February 28, 1994. This offer to conduct removal work is an attempt to settle this dispute, and is not in derogation of the position stated in the letter to Ms. Davis.

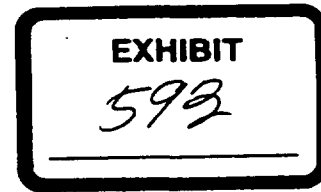
The Steering Committee is hopeful that this proposal is acceptable to U.S. EPA. The Technical Committee of the Steering Committee is prepared to meet with U.S. EPA to answer any questions and address any concerns you have about this proposal.

Sincerely,

SAAD SITE STEERING COMMITTEE

By: *Shelley Goddard*
Chairman of the Executive Committee

adh/290851



SCOPE OF WORK

The following is the scope of work the Saad Site Steering Committee (Committee) is prepared to implement:

- The Committee will perform a discrete soil and debris removal on Franklin Brick property in the area of the former settling basin as detailed on the attached map based on the rationale and boundaries presented below.
- The Committee has retained a karst expert and offers to have this expert assist USEPA in the design and implementation of a basin-wide dye trace study.

RATIONALE FOR AREA OF EXCAVATION (former settling basin)

- Area of known past surficial release;
- Area below concrete structure not previously excavated;
- Area observed to be the worst during past activities;
- Structurally defined using past aerial photos and physical exploration; and
- Addresses known and accessible off-site contamination; potential on-site contamination to be addressed by RI/FS type activities performed with TDEC as described below under Additional Activities.

EXCAVATION BOUNDARIES/LIMITATIONS (see attached map)

- Bounded on the south by (a) bedrock elevation increase (outcropping) and (b) past borings with minimal residuals;
- Bounded on east by the Franklin Brick building;
- Bounded on west by (a) CSX railroad berm and (b) previous Franklin Trench from which materials were removed and replaced with clean fill;
- Bounded on north by Saad/Franklin Brick property boundary;
- Appropriate standoff (approximately 10 ft - to be determined by appropriate engineering evaluation) from buildings/structures to prevent potential structural impacts; and
- Excavation depth established by surface of perched water table.

EXCAVATION VOLUME ESTIMATE

Assuming maximum depth to perched water table is approximately 12 feet and area of approximately 1200 sq. ft. Excavation volume is estimated to be approximately 500 to 700 cubic yards as a maximum volume.

ADDITIONAL ACTIVITIES

Completion of the work described above ends removal activities at the Saad Site. In addition to the intention to perform the work described above, the Committee will propose to perform the additional activities described below under the direction of TDEC:

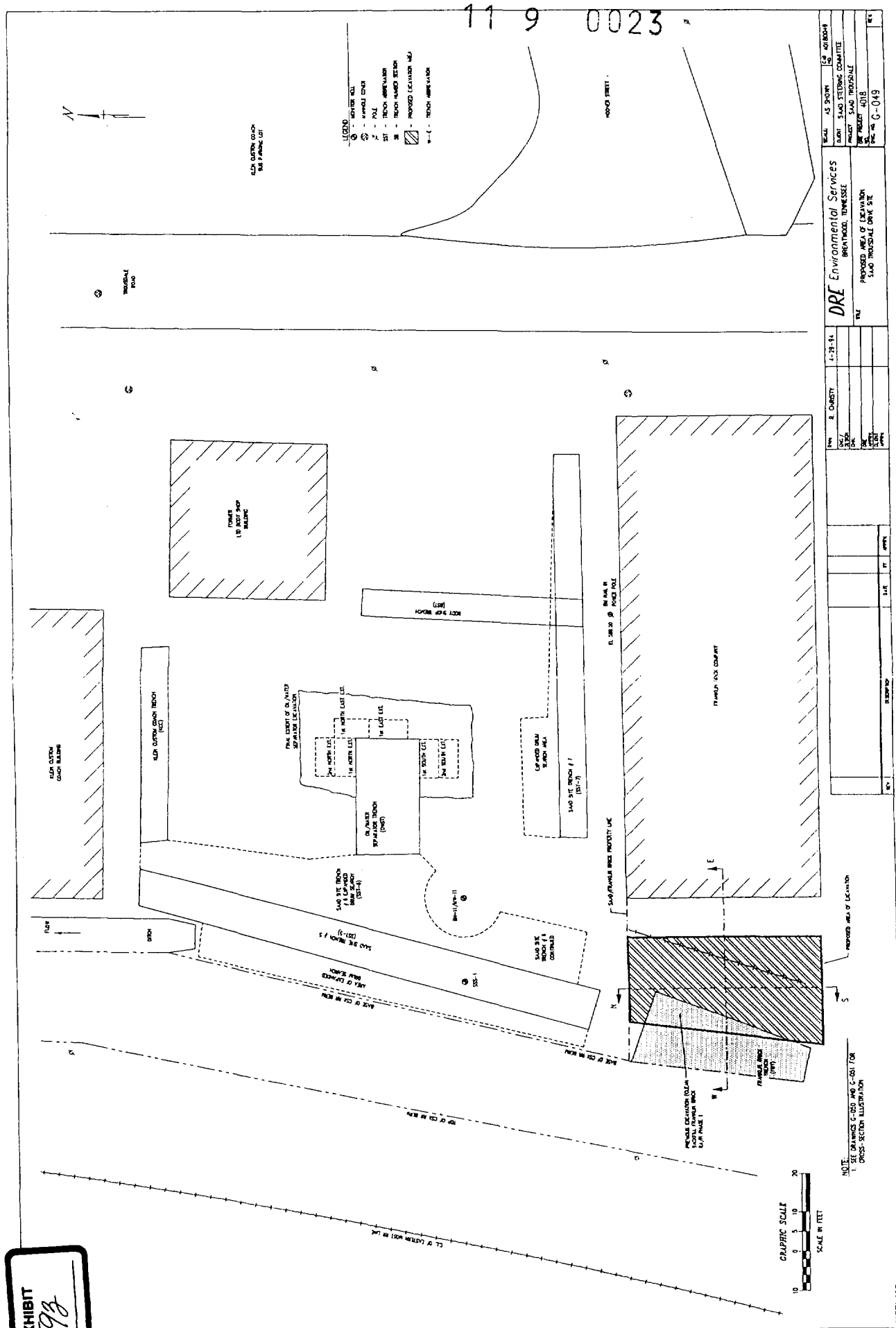
- Conduct a study to examine the nature and extent of perched water conditions at the Saad Site;
- Conduct a soil characterization study, including sampling, to define the potential scope of areal impact of the Saad Site;

Following the completion of the additional activities described above, the Committee will use the available data to prepare the following for TDEC:

- A Remedial Investigation Report, including a Baseline Risk Assessment; and
- A focused Feasibility Study using available data to evaluate potential remedial alternatives relative to the Saad Site.

Note: The Committee recommends any request for an engineering evaluation and investigation of the railroad berm be made to CSX transportation because CSXT owns the berm and has the technical expertise required to perform this in-house.

EXHIBIT
592



NOTE:
1. SEE DRAWINGS G-050 AND G-051 FOR CROSS-SECTION ILLUSTRATION

11 9 0024

FEET BELOW GROUND

W

E

CSX RAIL BERM

FRANKLIN BRICK BUILDING

BASE OF BERM

10'-0" STANDOFF FROM CSX BERM

PREVIOUS AREA OF EXCAVATION (FILLED WITH CLEAN MATERIALS)

GROUND SURFACE

10'-0" STANDOFF FROM FRANKLIN BRICK BUILDING

12'-0" MAXIMUM DEPTH OF EXCAVATION

PERCHED WATER TABLE

PERCHED WATER TABLE

TOP OF CONCRETE PAD

PROPOSED EXCAVATION AREA

APPROXIMATE TOP OF BEDROCK

GRAPHIC SCALE



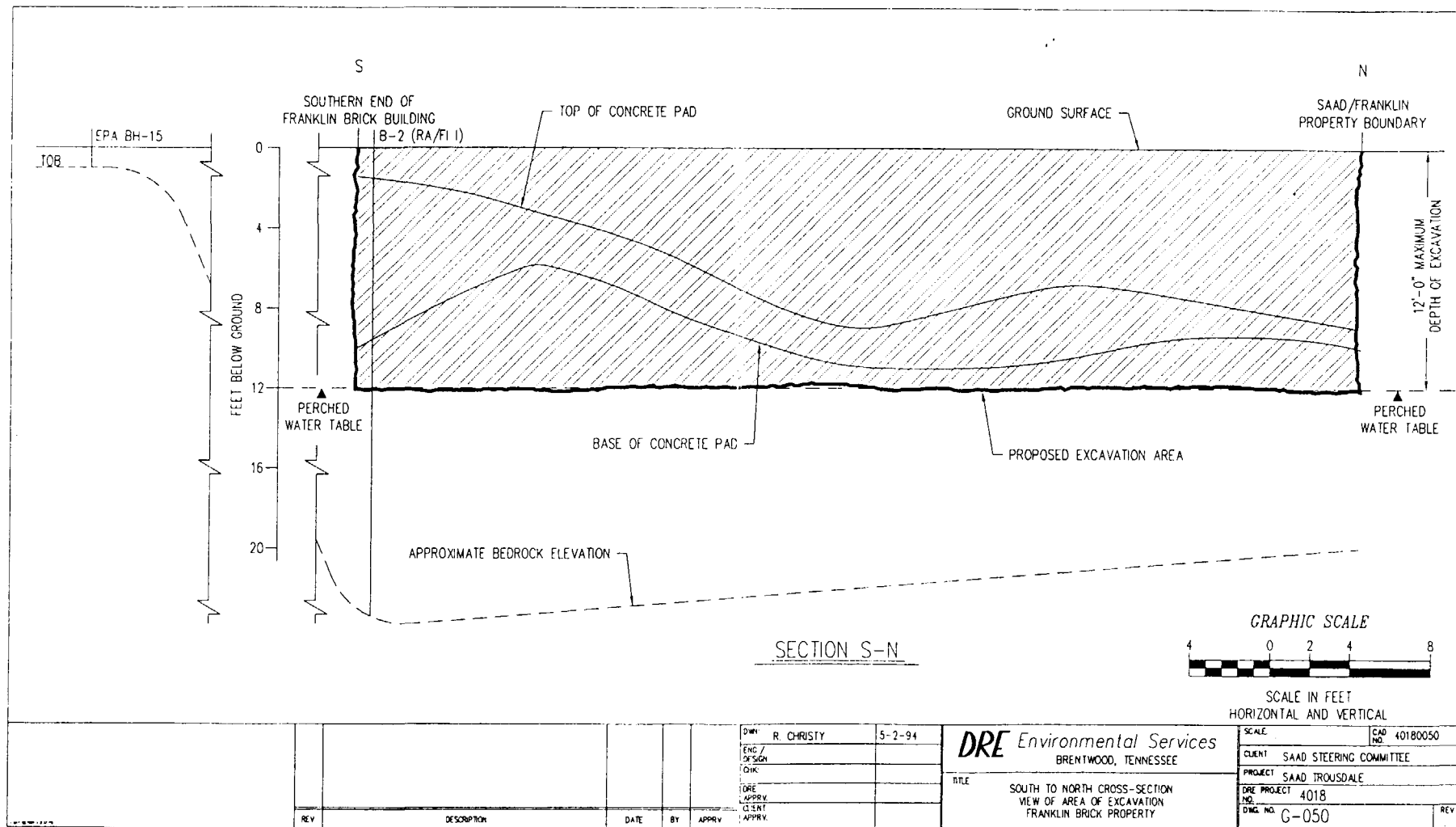
SCALE IN FEET
HORIZONTAL AND VERTICAL

SECTION W-E

EXHIBIT

592

REV	DESCRIPTION	DATE	BY	APPRV.	DWG: R. CHRISTY	5-2-94	DRE Environmental Services BRENTWOOD, TENNESSEE TITLE WEST TO EAST CROSS-SECTION VIEW OF AREA OF EXCAVATION FRANKLIN BRICK PROPERTY	SCALE:	CAD NO 40180051
					ENG / DESIGN			CLIENT	SAAD STEERING COMMITTEE
					CHK:			PROJECT	SAAD TROUSDALE
					DRE APPRV			DRE PROJECT NO.	4018
					CLIENT APPRV			DWG. NO	G-051



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EXHIBIT
593